

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

EARL PARRIS, JR., individually,)	
and on behalf of a class of persons)	
similarly situated,)	
)	
Plaintiff,)	
)	Case No. 4:21-cv-00040-TWT
v.)	
)	
3M COMPANY, <i>et al.</i> ,)	
)	
Defendants.)	

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Earl Parris, Jr. (“Plaintiff”), Intervenor-Plaintiff City of Summerville (“Intervenor”), Defendant 3M Company (“3M”), Defendant Daikin America, Inc. (“Daikin”), Defendant Huntsman International, LLC (“Huntsman”), Defendant Pulcra Chemicals, LLC (“Pulcra”), Defendant Mount Vernon Mills, Inc. (“MVM”), Defendant Town of Trion, Georgia (“Town of Trion”) Defendant/Cross-claimant, Ryan Dejuan Jarrett (“Jarrett”) (collectively, “Defendants”) (altogether, “Parties”) by and through their attorneys, hereby move this Court for entry of the Stipulated Joint Protocol Governing Discovery of Documents and Electronically Stored Information, attached as Exhibit A.

In accordance with the Court's May 24, 2022 Scheduling Order, the Parties have conferred on issues involving electronic and computer-based media and have set forth the resulting agreement in the attached Exhibit A. Accordingly, the Parties respectfully request that the Court enter the Stipulated Joint Protocol Governing Discovery of Documents and Electronically Stored Information.

Respectfully submitted this 13th day of June, 2022.

<p><u>/s/ Jeffrey J. Dean</u></p> <p>Gary A. Davis, <i>Pro Hac Vice</i> James S. Whitlock, <i>Pro Hac Vice</i> DAVIS & WHITLOCK, P.C. 21 Battery Park Avenue, Suite 206 Asheville, NC 28801 (828) 622-0044 (828) 398-0435 jwhitlock@enviroattorney.com gadavis@enviroattorney.com</p> <p>Jeffrey J. Dean GA Bar No. 006890 Thomas Causby GA Bar No. 968006 MORRIS & DEAN, LLC 101 E. Crawford St. Dalton, GA 30720 (706) 226-0300 (706) 229-4363 jeff@morrisanddean.com tom@morrisanddean.com</p> <p><i>Attorneys for Plaintiff</i></p> <p><u>/s/ William M. Droze</u></p> <p>William M. Droze Georgia Bar No. 231039 T. Matthew Bailey Georgia Bar No. 194516 TROUTMAN PEPPER HAMILTON SANDERS, LLP 600 Peachtree Street, N.E. Suite 3000 Atlanta, GA 30308 william.droze@troutman.com matt.bailey@troutman.com</p>	<p><u>/s/ J. Anderson Davis</u></p> <p>J. Anderson Davis GA Bar No. 211077 BRINSON, ASKEW, BERRY, SEIGLER, RICHARDSON & DAVIS, LLP Post Office Box 5007 Rome, GA 30162 (706) 291-8853 (706) 234-3574 adavis@brinson-askew.com</p> <p>Jeff Friedman, <i>Pro Hac Vice</i> Lee Patterson, <i>Pro Hac Vice</i> FRIEDMAN, DAZZIO & ZULANAS, P.C. 3800 Corporate Woods Drive Birmingham, AL 35242 (205) 278-7000 (205) 278-7001 jfriedman@friedman-lawyers.com lpatterson@friedman-lawyers.com</p> <p><i>Counsel for the City of Summerville, Georgia</i></p> <p><u>/s/ Benjamin P. Harmon</u></p> <p>Jackson R. Sharman, III, GA Bar No. 637930 Benjamin P. Harmon, GA Bar No. 979043 M. Christian King (<i>PHV forthcoming</i>) Harlan I. Prater, IV (<i>PHV forthcoming</i>) W. Larkin Radney, IV (<i>PHV forthcoming</i>)</p>
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CERTIFICATE OF SERVICE
AND COMPLIANCE WITH LOCAL RULE 5.1

I hereby certify that I have this date electronically filed the within and foregoing, which has been prepared using 14-point Times New Roman font, with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

Dated: June 13, 2022

/s/ Benjamin P. Harmon

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